

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

WILLIAM DOYLE, on behalf of himself  
and all others similarly situated,

Plaintiff,

v.

FRANKLIN & MARSHALL COLLEGE,

Defendant.

Case No. 5:24-cv-01024-JLS

**PLAINTIFF'S UNOPPOSED MOTION TO PRELIMINARILY APPROVE CLASS  
ACTION SETTLEMENT, CERTIFY THE CLASS,  
APPOINT CLASS COUNSEL, APPROVE PROPOSED  
CLASS NOTICE, AND SCHEDULE A FINAL APPROVAL HEARING**

**PLEASE TAKE NOTICE THAT**, upon the Declarations of Nicholas A. Colella and Anthony M. Alesandro and the accompanying exhibits and memorandum of law, and upon all prior proceedings, pleadings, and filings in the above-captioned action, Named Plaintiff William Doyle moves for an Order under Federal Rule of Civil Procedure 23:

- (1) Preliminarily approving the proposed Settlement on behalf of the Settlement Class Members according to the terms of the Settlement Agreement;
- (2) Provisionally certifying, for purposes of the Settlement only, the following Settlement Class:

All students who satisfied their payment obligations to Franklin & Marshall College for Spring 2020 for tuition and/or Mandatory Fees (including any Health Services Fee and/or Student Activity Fee) and who were enrolled in at least one in-person, on-campus class.

Excluded from the Settlement Class are: (i) all students who had their tuition and fee obligations completely funded by F&M for the Spring 2020 semester; and (ii) Defendant; Defendant's officers, directors, agents, trustees, parents, children, corporations, trustees, representatives, employees, principals, servants, partners, joint

venturers, and/or entitles controlled by Defendant; and/or Defendant's heirs, successors, assigns, or other persons or entities related to or affiliated with Defendant and/or Defendant's officers.

- (3) Preliminarily appointing Named Plaintiff William Doyle as Settlement Class Representative;
- (4) Preliminarily appointing Nicholas A. Colella of Lynch Carpenter, LLP, and Michael A. Tompkins and Anthony M. Alesandro of Leeds Brown Law, P.C. as Class Counsel to act on behalf of the Settlement Class and the Settlement Class Representative with respect to the Settlement;
- (5) Approving the Parties' proposed settlement procedure, including approving the Parties' selection of RG/2 Claims Administration LLC as Settlement Administrator and approving the Parties' proposed schedule;
- (6) Entering the proposed Order Preliminarily Approving the Proposed Settlement and Provisionally Certifying the Proposed Settlement Class, attached as Exhibit A to the Settlement Agreement, which is attached as Exhibit 1 to the Declaration of Nicholas A. Colella; and
- (7) Granting such other and further relief as may be just and appropriate.

Dated: February 27, 2025

Respectfully submitted,

/s/ Nicholas A. Colella  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on February 27, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Nicholas A. Colella  
Nicholas A. Colella